

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

CONSUMER FINANCIAL PROTECTION
BUREAU, et al.

Plaintiffs,

vs.

STRATFS, LLC f/k/a STRATEGIC
FINANCIAL SOLUTIONS, LLC, et al.

Defendants, and

DANIEL BLUMKIN, et al.,

Relief Defendants.

Case No. 1:24-cv-00040-EAW-MJR

**[PROPOSED] ORDER GRANTING
RECEIVER'S EMERGENCY REQUEST FOR INSTRUCTION**

On April 15, 2024, Thomas W. McNamara, as Court-appointed receiver (“Receiver”), filed a report concerning proposed steps to protect consumers and an Emergency Request for Instruction and authorization from the Court regarding the proposed course of action (the “Report and Emergency Request for Instruction”). The Court having reviewed all papers and pleadings on file, and having heard arguments of counsel in connection with the Report and Emergency Request for Instruction, and good cause appearing, the Court orders as follows:

- 1) The Receiver may identify the National Foundation of Credit Counselors to consumers as a potential resource for debt relief assistance including telephone and website contact information;
- 2) The Receiver may identify the National Association of Consumer Bankruptcy Attorneys to consumers as a potential resource for debt relief assistance including telephone and website contact information;

- 3) The Receiver may provide a letter with information concerning this lawsuit which consumers may use should they wish to approach creditors directly; and
- 4) The Receiver may inform consumers that the Court's finding that they paid unlawful advanced fees may impact their potential rights and options, including the right to decline the amendment and the right to request a refund of fees previously paid, and suggest consumers consult independent counsel.

IT IS SO ORDERED, this ____ day of _____, 2024.

HONORABLE MICHAEL J. ROEMER
UNITED STATES MAGISTRATE JUDGE